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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

FEB 04 1994

SUBJECT: Approval of Additional Funding and Exemption
from the 12-Month Statutory Limit
Perry Phillips Landfill Site
West Caln Township, Pennsylvania

FROM: *[Signature]* Stanley L. Laskowski
Acting Regional Administrator (3RA00)

TO: Elliot Laws, Assistant Administrator
Office of Solid Waste and Emergency Response (OS-100)

THRU: Henry L. Longest, II, Director
Office of Emergency and Remedial Response (OS-200)

ATTN: Deborah Y. Dietrich, Director
Emergency Response Division (5202G)

ISSUE

The attached CERCLA Additional Funding Authorization pertains to the Perry Phillips Landfill Site in West Caln Township, Chester County, Pennsylvania (Site). Additional monies over the \$50,000 obligated on December 21, 1993, by the OSC under Delegation of Authority 14-1-A, are required to abate the imminent and substantial threat to public health and welfare posed by the release of elevated concentrations of hazardous substances, including tetrachloroethene, trichloroethene, 1,1-dichloroethene, 1,1,1-trichloroethane, and 1,1-dichloroethane, into the residential drinking water supplies.

The On-Scene Coordinator has determined that the Site continues to meet the criteria for conducting a Removal Action under the National Oil and Hazardous Substances Contingency Plan (NCP), 40 CFR 300.415. Additional funds in the amount of \$457,250 were approved by the Region to continue to mitigate the threat posed by the Site. Pursuant to Delegation of Authority 14-1-A giving the Regional Administrator authority to approve CERCLA funding requests with a total cost of less than \$2 million, Region III has approved additional funds, raising the Estimated Total Project Ceiling for this Site to \$507,250, of which approximately \$431,250 are Extramural Costs. Additionally, in anticipation of the length of this project and the seriousness of the problems

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associated with the Site, the Region has determined that the Site meets the criteria in Section 104(c)(1)(C) of CERCLA, 42 U.S.C. §9604(c)(1)(C), exemption to the 12-Month Statutory Limit based upon the consistency waiver delegated to the Regional Administrator under Delegation of Authority 14-2-B, and such waiver has been granted.

Attachment: Request for Additional Funding and Exemption from
the 12-Month Statutory Limit

4R200006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

FEB 04 1994

SUBJECT: Request for Additional Funding and Exemption
from the 12-Month Statutory Limit
Perry Phillips Landfill Site
West Caln Township, Pennsylvania

FROM: Michael Towle, OSC *Michael Towle*
Eastern Response Section (3HW31)

TO: Stanley L. Laskowski
Acting Regional Administrator (3RA00)

THRU: Abraham Ferdas, Associate Division Director
for Superfund Programs (3HW02) *Abraham Ferdas*

I. ISSUE

A removal site assessment completed on December 20, 1993, by the On-Scene Coordinator (OSC) in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300, has identified an immediate and significant threat to human health posed by the presence of elevated concentrations of hazardous substances in the drinking water supplies of residents living in the vicinity of the Perry Phillips Landfill Site (Site) in Chester County, Pennsylvania. Tetrachloroethene (a.k.a. Perchloroethene or PCE), trichloroethene (a.k.a. trichloroethylene or TCE), and 1,1-dichloroethene (a.k.a. 1,1-dichloroethylene or DCE), which exist in drinking water near the Site at concentrations exceeding EPA's Removal Action Levels for these substances, are hazardous substances within the meaning of Section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended, 42 U.S.C. Section 9601(14), since they are listed as hazardous substances at 40 CFR 302.4. The levels of hazardous substances present in the drinking water supply pose an immediate health risk due to increased chances of contracting cancer from PCE and TCE which are probable human carcinogens and from DCE which is a possible human carcinogen.

Using his authority under Delegation of Authority 14-1-A, the OSC initiated a Removal Action at the Perry Phillips Landfill Site on December 21, 1993, by obligating emergency CERCLA funding in the amount of \$50,000, to provide safe drinking water to affected residents. The Removal Action consists of the following: (1) determining the number of residences requiring an alternate supply of drinking water, (2) providing drinking water to residents with contaminated drinking water supplies, and (3) identifying and

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mitigating the source of the contamination to prevent the further spread of the contamination in the drinking water supply. The Site is not on the NPL, but no precedent-setting issues are associated with the response. Additional funding in the amount of \$457,250 and exemption from the 12-month statutory limit for removal actions is requested to allow for the identification of the affected residences, the identification and mitigation of the contamination source, and continued provision of an alternate supply of drinking water to affected residences to continue to abate the immediate health threat. Approval of this request would increase the Estimated Total Project Ceiling to \$507,250, of which \$431,250 are Extramural Costs.

II. BACKGROUND

A. Site Description

The Perry Phillips Landfill Site includes approximately 35 acres of rural land divided into two parcels. Parcel 1 (7.6 acres) was used as a landfill and a waste transfer station. Parcel 2 (27 acres) contains a landfill, miscellaneous drums, sewage disposal trenches, and a mobile home park. The owner of the Site reportedly used the Site to accept, sort, and dispose of various, largely unknown, wastes which included, scrap metal, sewage sludge, and miscellaneous drums which may include hazardous substances. Additionally, several residents report dumping of liquid chemical wastes in the vicinity of the affected residences. All residents near the Site, including those within the mobile home park, rely upon ground water for potable water supply.

A Site assessment performed by the EPA Field Investigation Team in 1988 showed that the Site was contaminated by low levels of organic contaminants in the soil and landfill leachate including benzene, polychlorinated biphenyl (PCB), and various volatile organic compounds (VOCs). Additionally, ground water was found to be contaminated with PCE, TCE, 1,1,1-trichloroethane (TCA), and the degradation products of these compounds, including 1,1-dichloroethane (DCA) and DCE. Subsequent sampling by the Chester County Health Department and EPA's Water Management Division, respectively, in 1990 and on November 10, 1992, confirmed the ground water contamination.

A removal assessment was initiated by the OSC on February 26, 1993, in response to reports of increasing contaminant levels. Samples of ground water were collected from private drinking water wells in the vicinity of the Site and analyzed for VOCs on four occasions (March 2, April 1, September 1, and November 29, 1993) in an effort to discern the extent and level of VOC contamination in drinking water wells. Once an approximation of the contamination plume orientation was established, the OSC determined that concentrations of hazardous substances in the drinking water had increased over time and that the hazardous substances extended approximately 1/2 mile from the suspected source area and existed above the EPA Removal Action Level in several drinking water wells.

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B. Quantities and Types of Substances Present

Analytical results indicate that several private drinking water wells in the vicinity of the Site are contaminated by PCE, TCE, DCE, TCA, and/or DCA, which are hazardous substances within the meaning of Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), because they are listed as hazardous substances at 40 CFR 302.4. The highest concentrations of these contaminants detected in private drinking water wells are: PCE at 1,100 ug/L, or parts per billion (ppb), TCE at 440 ug/L, DCE at 110 ug/L, TCA at 600 ug/L, and DCA at 270 ug/L. The EPA Removal Action Levels for PCE, TCE, and DCE, which are 70 ug/L, 300 ug/L, and 70 ug/L, respectively, have been exceeded in several drinking water wells indicating an immediate risk to human health. PCE and TCE are probable human carcinogens. DCE and DCA are potential human carcinogens. Since these compounds are VOCs, they readily transfer from the water into the air. Thus, exposure to these hazardous substances occurs via ingestion (drinking) and inhalation (showering).

C. National Priorities List Status

EPA is currently considering the Site for listing on the National Priorities List (NPL). The OSC will forward information on the Site to the Site Assessment Section for consideration.

D. State and Local Authorities' Roles

The Commonwealth of Pennsylvania Department of Environmental Resources (PADER) requested on December 21, 1993, that EPA provide an alternate source of drinking water to the affected residences since the Department did not have the resources to conduct the response. The OSC will coordinate Site activities with all appropriate State and local officials.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

Section 300.415 of the NCP (40 CFR 300.415) lists the factors to be considered in determining the appropriateness of a Removal Action. Paragraphs (b)(2)(i), (ii), and (vii) of Section 300.415 directly apply as follows to the conditions at the Perry Phillips Landfill Site:

- A. 300.415 (b)(2)(i) "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants."**

The Perry Phillips Landfill Site is situated within a moderately populated rural/residential area where a release of hazardous substances has occurred into the ground water system which serves as the sole source of drinking water to nearby residences. Hazardous substances, listed at 40 CFR 302.4, including tetrachloroethene (PCE), trichloroethene (TCE), 1,1,1-

trichloroethane (TCA), 1,1-dichloroethene (DCE), and 1,1-dichloroethane (DCA), have been detected within the drinking water of residences near the Site. The concentrations of PCE, TCE and DCE in the drinking water exceed EPA's Removal Action Levels for those compounds indicating an immediate and significant risk to human health via ingestion (drinking) and inhalation (showering) pathways. PCE, TCE, TCA, DCE, and DCA are volatile organic compounds which means that they readily transfer from water to air making them a threat via both the ingestion and inhalation pathways. Moreover, PCE and TCE are probable human carcinogens and DCE and DCA are potential human carcinogens indicating an increased chance of contracting cancer (and thus an increased cancer risk) due to exposure to these hazardous substances.

B. 300.415 (b)(2)(ii) "Actual or potential contamination of drinking water supplies or sensitive ecosystems."

Several drinking water wells in the vicinity of the Perry Phillips Landfill Site contain elevated concentrations of hazardous substances, most notably PCE, TCE and DCE which exist above the EPA Removal Action Level in several drinking water wells. These wells represent the sole source of drinking water for residents living near the Site since there is no alternative (e.g., public) water supply in the immediate vicinity. The concentrations of these hazardous substances are increasing over time indicating the potential for a nearby continuing source of these contaminants and for the continued spread of the contamination to other nearby drinking water wells.

C. 300.415 (b)(2)(vii) "The availability of other appropriate federal or state response mechanisms to respond to the release."

The Commonwealth of Pennsylvania Department of Environmental Resources (PADER) has been informed of the elevated levels of VOCs in the private wells by the OSC. On December 21, 1993, PADER requested EPA assistance in immediately providing a source of clean drinking water to affected residents since the Department does not have the resources to currently undertake the response action in a timely manner.

IV. ENDANGERMENT DETERMINATIONS

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the Response Action identified in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

Section 104(c) of CERCLA, 42 U.S.C. Section 9604(c), provides criteria for exemption from the 12-month statutory limit imposed upon removal actions. Given the severity and nature of the threats posed by the Perry Phillips Landfill Site and the time frame typically associated with mitigating threats posed by Sites involving contaminated drinking water, exemption from the 12-month statutory limit is warranted at this Site. PCE, TCE, and DCE, which are hazardous substances, exist in the water supply of residences near the Site posing an immediate increased cancer risk to exposed individuals. Exposure to the hazardous substances is from ingestion (drinking water) and inhalation (showering).

The increasing trend in contamination concentrations indicates that the plume of hazardous substances is spreading and that a nearby source of these substances exists. Since construction of a public water supply, i.e., water line, or provision of in-house treatment units while a source of contamination is mitigated (both typical solutions to ground water contamination sites) will each take longer than 12 months to complete, continued response actions, beyond 12 months, will be necessary to continue to protect the public health from the immediate risk posed by the Site.

The Pennsylvania Department of Environmental Resources has indicated that it does not have the resources to provide for safe drinking water at this Site in a timely manner and has requested EPA assistance. Thus, it is appropriate to continue the removal action beyond 12 months to avoid the foreseeable threat posed by the contaminated drinking water. The proposed actions will avoid this foreseeable threat by continuing to provide an alternate supply of safe potable water.

While this Site is not listed on the National Priorities List (NPL) and the final remedial action is not known, preliminary scoring of the Site indicates a strong candidate for proposal to the NPL. The proposed removal action will determine the extent of contaminated drinking water, the location of the source(s) of the contamination, and will provide a source of safe water for drinking and household use. These actions would be the first step in any long-term action conducted at the Site and would ensure risk reduction consistent with long-term cleanup goals, e.g., Maximum Contaminant Levels (MCLs). Since contaminants will remain in the ground water, the removal action will not preclude a remedial action at this Site.

VI. PROPOSED ACTIONS AND COSTS

A. Actions

The actions proposed for this Site are designed to mitigate the immediate threat posed to the residents via ingestion and inhalation of elevated concentrations of hazardous substances, including PCE, TCE, DCE, TCA, and DCA, within their potable water

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supply and provide for the continued supply of safe drinking water to affected and potentially affected homes. The proposed actions are to continue the present Scope of Work, as set forth in Special Bulletin A, Notification of OSC \$50,000 Activation (see copy attached), and to conduct the following actions in phases as follows:

PHASE I

- Mobilize personnel and equipment to Site.
- Provide Site security as needed.
- Sample and analyze the drinking water supply of residents potentially affected by the VOC contamination.
- Provide whole-house treatment units to residents with VOC concentrations in their drinking water supply exceeding the EPA Removal Action Level (bottled water may be supplied as an interim measure).
- Provide whole-house treatment units to residents with VOC contamination which may not currently exceed the EPA Removal Action Level, but which may exceed the EPA Removal Action Level at some time based upon a trend of increasing concentration levels.
- Continue periodic sampling and analysis of ground water within the potentially affected area and monitoring of the whole-house treatment units.

PHASE II

- Determine, via investigation, sampling, and analysis, the area of origin of the VOC contamination in order to mitigate the source and characterize the plume of VOC contamination.
- Mitigate source of VOC contamination including treatment, transportation and/or disposal of contaminated materials.
- Provide for continued monitoring and maintenance of whole-house treatment units to ensure safe drinking water.
- Identify and evaluate alternative means of providing a more permanent supply of safe drinking water to affected and potentially affected residents.

At this time it is anticipated that the project will run longer than the statutory 12-month time limit for Removals due to the need to ensure a continued supply of safe drinking water to affected homes.

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B. Estimated Costs

Estimated costs associated with the proposed actions are itemized in Table 1. The costs are broken down to represent the phases discussed above. Phase II estimated costs include estimated costs associated with Phase I.

TABLE 1 - ESTIMATED COSTS

<u>Extramural Costs</u>	CURRENT CEILING	COSTS TO DATE	PROPOSED CEILING
Regional Allowance Costs			
ERCS-Phase I	\$ 35,000	\$9,400	-
ERCS-Phase II	\$ -		\$345,000
Other Extramural Costs			
TAT-Phase I	\$ 7,500	\$3,092	-
TAT-Phase II	\$ -		\$ 30,000
Subtotal, Extramural Costs			
Phase I	\$42,500	\$12,492	-
Phase II	-		\$375,000
Contingency (15%)	-		\$ 56,250
<u>Total Extramural Costs</u>			
Phase I	\$42,500	\$12,492	-
Phase II	-		\$431,250
<u>Intramural Costs</u>			
EPA Direct			
Phase I	\$ 2,500	\$300	-
Phase II	-		\$ 26,000
EPA Indirect			
Phase I	\$ 5,000	\$700	-
Phase II	-		\$ 50,000
<u>Total Intramural Costs</u>			
Phase I	\$ 7,500	\$13,492	-
Phase II	-		\$ 76,000
<u>Estimated Total Project Ceiling</u>			
Phase I	\$50,000		-
Phase II	-		\$507,250

NOTE: Phase II estimated costs include estimated costs associated with Phase I.

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C. Contribution to Remedial Performance

EPA is currently considering the Perry Phillips Landfill Site for proposal onto the National Priorities List (NPL). However, since the Site is not currently on the NPL, there is no plan for long-term Remedial Actions at the Site to address the threat to human health. The proposed Removal Action is consistent with accepted removal practices for addressing the contaminated drinking water and would contribute to any future Site activities intended to further abate the threat posed to human health. All information obtained during the Removal Action will be forwarded to the Site Assessment Section for use in consideration for proposal to the NPL.

D. Compliance with Applicable or Relevant and Appropriate Requirements (ARARs)

The OSC contacted PADER on January 6, 1994, regarding the identification of ARARs for the Perry Phillips Landfill Site and is presently awaiting receipt of those ARARs. The proposed Removal Action set forth herein will comply with all applicable or relevant and appropriate environmental requirements to the extent practicable considering the exigencies of the situation. Such requirements include Maximum Contaminant Levels (MCLs) designated under the Safe Drinking Water Act and regulations under the Resource Conservation and Recovery Act addressing handling of hazardous wastes, e.g., spent carbon.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this Site would not address the health threat currently posed to several residents via ingestion and inhalation of hazardous substances present in their water supply. Additionally, delayed action would allow the concentration levels of the hazardous substances in the drinking water to continue their increasing trend and spread to other nearby drinking water wells.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues pertaining to this Site.

VIII. ENFORCEMENT

The EPA Removal Enforcement Section has been provided with all background information available to pursue any and all Enforcement Actions pertaining to the Perry Phillips Landfill Site (see attached Confidential Enforcement Addendum).

IX. RECOMMENDATION

Because conditions at the Perry Phillips Landfill Site meet the NCP criteria (40 CFR 300.415) for a Removal Action, I recommend your approval of this funding increase of \$457,250. Additionally, since the exemption criteria of Section 104(c) of CERCLA are met, I recommend your approval of exemption from the 12-month statutory limit. Approval of this increase would raise the Estimated Total Project Ceiling to \$507,250, of which approximately \$431,250 are Extramural Costs. Please indicate your approval or disapproval by signing below. I recommend your approval to initiate response actions because of the nature of the health threat described herein.

APPROVED: W. R. Rasmussen, Acting RA DATE: 2-3-94

DISAPPROVED: _____ DATE: _____

Attachments: Confidential Enforcement Addendum
Special Bulletin A

AR200015

SPECIAL BULLETIN A
Perry Phillips Landfill Site
Old Wilmington Road
Phillipsville, Chester County, Pennsylvania 19320

TO: REGIONAL RESPONSE CENTER, U.S. EPA REGION III

DATE: DECEMBER 21, 1993

FROM: MICHAEL TOWLE, ON-SCENE COORDINATOR
EASTERN RESPONSE SECTION (3HW31)

THRU: ABRAHAM FERDAS, ASSOCIATE DIVISION DIRECTOR
OFFICE OF SUPERFUND (3HW02)

THRU: DENNIS P. CARNEY, CHIEF
SUPERFUND REMOVAL BRANCH (3HW30)

THRU: GREGG CRYSTALL, CHIEF
EASTERN RESPONSE SECTION (3HW31)

SUBJECT: NOTIFICATION OF \$50,000 ACTIVATION

I. INTRODUCTION

A removal site assessment completed on December 20, 1993, by On-Scene Coordinators (OSCs) Michael Towle and Terry Stilman in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300, has identified an immediate and significant threat to human health posed by the presence of elevated concentrations of hazardous substances in the drinking water supplies of residents living in the vicinity of the Perry Phillips Landfill Site (Site) in Chester County, Pennsylvania. Tetrachloroethene (PCE) and trichloroethene (TCE), which are hazardous substances as defined in Section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, (CERCLA), 42 U.S.C. Section 101(14), are present in private drinking water wells near the Site at concentrations which exceed EPA's Removal Action Levels for these substances in drinking water. The OSCs have determined that the Site meets the criteria for initiating a Removal Action under Section 300.415 of the NCP. As a result of the Site conditions, immediate action pursuant to Section 104 of CERCLA is needed at the Site.

Delegation of Authority 14-1-A permits the Region to redirect authority to the OSC to obligate emergency CERCLA funding in the amount of \$50,000 to initiate removal/stabilization actions. Utilizing this authority, OSC Stilman has approved the use of CERCLA funding to mitigate the threat to public health, welfare, and the environment at the Perry Phillips Landfill Site. OSC Towle will undertake response actions at the Site.

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II. BACKGROUND

The Perry Phillips Landfill Site includes approximately 35 acres of rural land divided into two parcels. Parcel 1 (7.6 acres) was used as a landfill and a waste transfer station. Parcel 2 (27 acres) contains a landfill, miscellaneous drums, sewage disposal trenches, and a mobile home park. According to the EPA Site Assessment Section, the owner of the Site used the Site to accept, sort, and dispose of various, largely unknown, wastes which included, scrap metal, sewage sludge, and miscellaneous drums. A Site assessment performed by the EPA Field Investigation Team in 1988 showed that the Site was contaminated by low levels of organic contaminants in the soil and landfill leachate including benzene, polychlorinated biphenyl (PCB), and various volatile organic compounds (VOCs). Additionally, ground water was found to be contaminated with PCE, TCE, trichloroethane (TCA), and the degradation products of these compounds, including dichloroethane (DCA) and dichloroethene (DCE). Subsequent sampling by the Chester County Health Department and EPA's Water Management Division, in 1990 and on November 10, 1992, respectively, showed levels of PCE in the private well owned by the landfill owner, Perry Phillips, of 74.2 and 246 ug/L and low levels of trichloroethene (<35 ug/L) in one of the wells serving the mobile home park.

A removal assessment was initiated by OSC Towle on February 26, 1993. Samples of ground water were collected from private wells in the vicinity of the Site and analyzed for VOCs on 4 occasions (March 2, April 1, September 1, and November 29, 1993) in an effort to discern the extent and level of VOC contamination in drinking water wells. The analytical results indicate that only the private well on Perry Phillips property (parcel 1) contains significant levels of PCE; most recently detected at 1,000 ug/L. The Removal Action Level for PCE is 70 ug/L. Nearby private wells, however, are contaminated by TCE; most recently detected at 530, 440, and 370 ug/L in three off-Site homes. The Removal Action Level for TCE is 300 ug/L.

III. THREAT

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a Removal Action. Paragraphs (b)(2)(i), (ii), and (vii) of Section 300.415 directly apply as follows to the conditions at the Perry Phillips Landfill Site:

- A. 300.415 (b)(2)(i) "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants."

The Perry Phillips Landfill Site is situated within a moderately populated rural/residential area where a release of hazardous substances has occurred into the ground water system. Hazardous substances, including tetrachloroethene (PCE), trichloroethene (TCE), trichloroethane (TCA), dichloroethene (DCE), and

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dichloroethane (DCA), have been detected within the ground water and private drinking water wells. Residents living near the Site are currently drinking water contaminated with hazardous substances and levels of PCE and TCE which exceed EPA's Removal Action Levels. PCE, TCE, TCA, DCE, and DCA are volatile organic compounds which means that they readily transfer from water to air making them a threat via ingestion (e.g., drinking) and inhalation (e.g., showering) pathways. PCE, TCE, and DCE are potential human carcinogens.

- B. 300.415 (b)(2)(ii) "Actual or potential contamination of drinking water supplies or sensitive ecosystems."

Several private drinking water wells in the vicinity of the Perry Phillips Landfill Site contain elevated concentrations of hazardous substances, most notably PCE and TCE. These ground water wells represent the sole source of drinking water for residents living near the Site since there is no alternative (e.g., public) water supply in the immediate vicinity. PCE and TCE have been detected in several drinking water wells above the EPA Removal Action Level.

- C. 300.415 (b)(2)(vii) "The availability of other appropriate federal or state response mechanisms to respond to the release."

The Commonwealth of Pennsylvania Department of Environmental Resources (PADER) has been informed of the elevated levels of VOCs in the private wells by the OSCs and has requested EPA assistance to respond to the Site.

IV. SCOPE OF WORK

With the \$50,000 emergency funding, the OSC proposes to mitigate the immediate threat posed to the residents via ingestion of drinking water contaminated with VOCs at the EPA Removal Action Levels for PCE, TCE, TCA, DCE, or DCA. The planned Removal Action consists of the following activities:

- Mobilize personnel and equipment to Site.
- Sample and analyze the drinking water supply of all residents potentially affected by the VOC contamination.
- Provide whole-house treatment units to residents with VOC concentrations in their drinking water supply exceeding the EPA Removal Action Level (bottled water may be supplied as an interim measure).
- Provide whole-house treatment units to residents with VOC contamination which may not currently exceed the EPA Removal Action Level, but which may exceed the EPA Removal Action Level at some time based upon a trend of increasing concentration levels.

- Continue periodic sampling and analysis of ground water within the potentially affected area and monitoring of the whole-house treatment units.
- Determine, via investigation, sampling, and analysis, the area of origin of the VOC contamination in the ground water in order to mitigate the source.

The authorized budget for this \$50,000 Removal is:

EPA (Direct)	\$2,500
EPA (Indirect)	\$5,000
TAT	\$7,500
ERCS	<u>\$35,000</u>
TOTAL	\$50,000

V. OSC ACTION

On December 20, 1993, the OSCs determined that a public health threat exists at the Perry Phillips Landfill Site. OSC Stilman activated \$50,000 to initiate a Removal Action to mitigate the threat to human health. OSC Stilman issued Delivery Order 3002-03-081 to initiate a Removal Action to mitigate the threat to human health.

Because the conditions at the Perry Phillips Landfill Site meet the conditions set forth in Section 300.415 of the NCP for an immediate removal, OSC Stilman has initiated funding of this Removal Action. OSC Towle will undertake response actions at the Site.

Michael Towle, OSC
EPA Region III
Philadelphia, PA